

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Superior Barrel and Drum - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: **POLREP #18**
Subcontract Awarded for Transport and Disposal of Acidic, Basic and Flammable Materials
Superior Barrel and Drum

Elk, NJ
Latitude: 39.6930670 Longitude: -75.1345550

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Date: 1/27/2014

Reporting Period: January 21, 2014 through January 26, 2014

1. Introduction

1.1 Background

Site Number:	A23K	Contract Number:	EP-S2-10-01
D.O. Number:		Action Memo Date:	11/22/2013
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	8/30/2013	Start Date:	9/27/2013
Demob Date:		Completion Date:	
CERCLIS ID:	NJD986630705	RCRIS ID:	
ERNS No.:		State Notification:	8/29/2013
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

A Removal Action is required to identify remaining hazardous materials that are on-Site and properly contain and dispose of such.

1.1.2 Site Description

On August 29, 2013 the New Jersey Department of Environmental Protection (NJDEP) notified the United States Environmental Protection Agency (EPA) Region 2 Regional Emergency Operations Center (REOC) of deteriorated conditions at the Superior Barrel and Drum Site. NJDEP Emergency Response personnel requested the assistance of EPA On-Scene Coordinators (OSCs) with investigating conditions of containers at the facility.

On August 30, 2013 EPA OSCs met with NJDEP and Gloucester County officials at the Superior Barrel and Drum Site. Observed were thousands of containers, mostly 275-gallon totes and 55-gallon drums, located along a public road as well as in the woods, wetlands, and elsewhere throughout the property. Containers were stacked several high in various locations and were shown to be various states of deterioration. Containers were found to be leaking, void of tops, exposed to weather elements, rusted, damaged due to gunshots, stored improperly, and laying on their sides. Numerous trailers were also found to be open and containing 55-gallon drums. The containers throughout the Site appeared to be full of contents, however most did not have labels. Labels on some containers include flammable liquids, corrosive, marine pollutant, flammable solid, oxidizer, and non-hazardous material.

NJDEP referred the Site to EPA on August 30, 2013 due to the conditions at the Site, including drum contents spilled in wetlands, contents pooling alongside the road, and unsecured access to the facility.

1.1.2.1 Location

The Superior Barrel and Drum Site is located at 798 Jacob Harris Lane in Elk Township, Gloucester County, New Jersey (coordinates 39.6869, -75.132314). The facility consists of a main processing building and numerous trailers located throughout the 5.5-acre property. The entrance to the facility is down a dirt road. The north end of the Site is bordered by Industrial Drum Company, a competitor in the drum reconditioning business. A chain-link fence separates the two properties. Jacob Harris Lane marks the eastern boundary of the Site, beyond which is a densely forested property. To the south are private lands which are also densely wooded with several marshy areas. The western boundary is State Route 55, a major highway. Currently, the facility is inoperable with last known operation activity occurring in 2012. Several companies have been to the property in efforts to remove machinery and equipment. The Site is open to persons traveling along Jacob Harris Lane, a public road. The Site is unsecured from each direction and evidence of trespassers has been noted. All doors of the main building and trailers are open.

The Site consists of two operational areas. The main area is where the permanent steel structure is

located. This area would receive containers, rinse the containers, and recondition them for future market. This area is approximately 2.4 acres with containers located throughout. The additional operational area appears to be mainly for storage of full 275-gallon totes and 55-gallon drums, with several trailers holding containers. This area encompasses approximately .32 acres of land. Both areas show signs of impact from leaking containers or dumping of materials.

1.1.2.2 Description of Threat

The facility is located in a federally recognized wetland. Thousands of containers are in various conditions of deterioration and leaking containers have been noted. Many labels on containers indicate contents of hazardous substances, however the property owner and his attorney have stated that the drums are of unknown contents. The facility is unsecured with access from a public road and surrounding trails. Shot-gun shells from target practice on containers are evidence of trespassers, along with signs of vandalism.

Companies that are located in the immediate area, along Jacob Harris Lane, are on private water wells. Residential properties located along Whig Road (<1/4 mile away) and Aurora Road (<1/2 mile) are also on private well water.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

NJDEP collected samples from four (4) random containers, all 55-gallon drums. Field screening tests were conducted on them using Photoionization Detectors, HazMat ID, pH, flash point, and others. Contents revealed materials to be corrosive, highly flammable, and having high readings of volatile organic compounds (VOCs). The materials sampled did not reflect the labels on the containers.

A Removal Assessment was completed on September 27, 2013. Approximately 252 containers were opened and aliquots were collected for HazCat. Field laboratory results indicated the presence of hazardous characteristics. Samples were collected from select drums and totes where they were shipped to NELAC accredited laboratories. Analytical results showed toluene, benzene, TCE, PCBs, lead, and many other hazardous substances make up the contents of the containers. Soil samples also showed attribution between the materials in the containers and that in the soil.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Personnel continued to locate unsorted on-site containers and move them into the appropriate waste group staging areas. All containers of neutral, acid, base, flammable and combustible materials have been located and staged. The majority of the containers in these waste groups have been overpacked (if drums) and/or prepared for shipping in accordance with DOT regulations. Bulking of small-volume flammable liquids was completed, and all acids, combustible acids, and bases have been staged in the on-site warming room in preparation for being transported off-site.

The subcontract was awarded for the transport and treatment, recycling and/or disposal of the majority of the on-site flammables, acids and bases.

EPA continued to work with numerous partners including the Gloucester County Fire Marshal's Office, HazMat Team, NJDEP, U.S. Fish and Wildlife Service, and local officials. NJDEP personnel continued weekly visitations and communication with Elk Township officials also continued. Security personnel continued to patrol the Site during non-operational hours.

2.1.2 Response Actions to Date

To view removal actions completed during other operational periods, please refer to previous Pollution Reports.

On January 21, 2014, the subcontract was awarded for the transport, treatment and disposal of the majority of the on-site acids, bases and flammable materials. The list of materials included with this subcontract includes 23 shipping groups, which were formed based on similar characteristics of the materials (i.e., corrosive, organic, inorganic, liquid, solid, combustible, flammable, etc.). For each of

these shipping groups, a waste profile must be developed for the disposal facilities which details the shipping group's characteristics and includes the analytical results of the samples (composite or grab) from that group. On January 22, 2014, EPA approved the waste profile for one of these 23 shipping groups: waste inorganic liquids. The other profiles are being prepared.

Between January 21 and 24, 2014, staging of all containers of acids, bases, flammable and combustible materials was completed, in preparation for shipment. Overpacking of drums continued. All acids (waste stream A1), combustible acids (A2) and bases (B2) were moved into the on-site warming room so they can thaw prior to being shipped off-site. On January 24, 2014, bulking of low-volume flammable liquids was conducted.

On January 22, 2014, approximately 70 samples in the N1 and N3 waste groups were shipped to the EPA PHILIS laboratory in Edison, NJ for volatile organic compound analysis. Screening level results will be provided, which will aid in removing containers of hazardous constituents from this bulked waste group. If results are adequate for singling out containers of hazardous materials, samples of all neutral materials (as categorized during HazCat field testing) may be sent to the PHILIS lab as a pilot project. This will facilitate composite sampling and bulking of the neutral waste streams. Composite sampling was put on hold for the week; no composite samples were collected, and efforts were focused on updating the tracking databases to resolve waste stream discrepancies.

RST continued to provide perimeter and spot air monitoring to ensure the safety of personnel and surrounding properties. Additionally, RST continued to manage the SCRIBE and Response Manager databases. A pilot project to generate the first Site-specific FlexViewer is currently underway. This visual, interactive map will give EPA management the ability to monitor the Common Operating Picture (COP) of Site activities.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA has designated Bonnie Hriczko as the enforcement case officer. A 104(e) was drafted and submitted to the property owner. To date, no response has been received from Thomas Toy/Superior Barrel. As such, ORC drafted a Notice and Demand Letter to Superior Barrel, which is currently undergoing concurrence.

Following receipt of the 104(e) information request that EPA sent out to potential arrangers of on-site waste on January 14 and 15, 2014, several companies have responded to EPA with inquiries regarding the containers and/or documents found on-site. Enforcement personnel have been addressing these inquiries.

2.1.4 Progress Metrics

Waste Stream	Sub-Class	Composite Samples Collected	Amount of Containers in Composite
NEUTRAL			
	N1	1	35
	N2	0	-
	N3a	1	35
	N3b		-
	N4	0	-
	N5	0	-
	N6	0	-
	N7	0	-
FLAMMABLE			
	F1a	1	33
	F1b	1	12

F1c	1	11
F1d	1	9
F1e	1	12
F1f (Liquid Brown)	1	12
F1g (Liquid Brown)	1	12
F1h (Liquid Brown on Water)	1	12
F1i (Liquid Amber)	1	10
F1j (Liquid Brown)	1	12
F1k (Misc. Liquid)	1	12
F1 Grab	4	*
F2a (Powder)	1	10
F2b (Soil)	1	11
F2c (Solid Chunks)	1	8
F2d (Gel)	1	3
F2e (Misc. Solid)	1	6
F3a (Sludge Red)	1	12
F3b (Sludge Browns)	1	12
F3c (Sludge Browns)	1	12
F3d (Sludge Browns)	1	10
F3e (Sludge Browns)	1	11
F3f (Misc. Sludge)	1	12
F3 Grab	1	*
F4a (Acid Dark)	1	13
F4b (Acid Light)	1	5
F4c (Acid Brown)	1	12
F4d (Acid Tan)	1	7
F4e (Acid Sludge)	1	4
F5a (Base)	1	7
F6a (Paint Red/Cream)	1	8
F6b (Paint Blue)	1	12
F7a (Resin Clear)	1	5
F7b (Resin Gray Sludge)	1	4
F7c (Resin Red Sludge)	1	6
F7d (Resin Black Liquid)	1	4
F7e (Resin (Gold)	1	3
F7f (Resin Brown)	1	5
F7g (Resin Tan)	1	4
F7h (Resin Multicolor)	1	7
F7i (Resin White)	1	3
F7j (Resin Red)	1	2
F8a (Adhesive Black)	1	3
F8b (Adhesive Red Orange)	1	3
F8c (Adhesive Brown)	1	5
F8d (Adhesive Green Yellow)	1	5
F8e (Adhesive Tan)	1	2
F8f (Adhesive Gray Blue)	1	4
F8g (Adhesive Red Orange)	1	6
F8h (Adhesive (Green Gray)	1	9

ACID			
	A1a (pH=4; low viscosity)	1	12
	A1b (pH=4; high viscosity)	1	10
	A1c (pH=3)	1	11
	A1d (Acidic Solids)	1	5
	A1e (pH=1)	1	3
	A1f (pH=2)	1	7
	Grab (difference in properties prevent from bulking)	11	*
	A2a (pH=3-4)	1	11
	A2b (pH=3-4)	1	12
BASE			
	B1a (pH=14)	1	2
	B1b (pH=14)	1	2
	B1c (pH=13)	1	2
	B1d (pH=13)	1	8
	B1e (pH=12)	1	4
	B1f (pH=11)	1	7
	B1g (pH=10)	1	7
	B1h (pH=10)	1	5
	B1i (pH=10)	1	7
	B1j (pH=11)	1	4
	B1k (pH=11)	1	9
	B1l (pH=14)	1	3
	B1m (pH=13)	1	2
	B1n (pH=13)	1	3
	B1o (pH=12)	1	4
	B1p (pH=10)	1	2
	B1q (pH=10)	1	2
	B1 Grab (difference in properties prevent from bulking)	5	*
	B2a (Combustible Low Sludge)	1	11
	B2b (Combustible High Sludge)	1	10
	B2 Grab (Combustible)	3	*

* Grab samples are collected from one container and are not bulked due to unique features.

The following table will be completed once transport and disposal operations begin.

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

2.2 Planning Section

2.2.1 Anticipated Activities

Collaboration between EPA, NJDEP, FWS, County, and local officials will continue throughout the removal activities at the Superior Barrel and Drum Site.

During the next operational period, transport and disposal will be scheduled for the waste inorganic liquid shipping group, for which a waste profile has been approved. Wastes may be shipped off-site as early as the end of the week of January 27, 2014. Waste profiles for the other shipping groups will be developed and approved. All disposal facilities for these shipping groups will be checked for regulatory compliance under the Off-Site Rule.

The EPA PHILIS laboratory will provide analytical results for the samples from the N1 and N3 waste streams. These results may aid in determining which containers should be removed from these waste streams, due to hazardous characteristics. Abbreviated HazCat field testing of the on-site oxidizers will continue, to determine if the volume for this waste stream can be reduced.

On-site personnel will continue to stage containers in their respective waste groups, and composite samples will be collected from each group.

2.2.1.1 Planned Response Activities

During the next operational period, transport and disposal of wastes will be scheduled, after the waste profiles have been developed and approved. EPA will conform to the Off-Site Rule prior to release of constituents.

Analytical data for the N1 and N3 waste streams may become available during the next operational period. Site managers and chemists will review any data and consider options for future composite sampling, bulking and disposal of material.

RST will continue to work with EPA on the development of a Common Operational Picture (COP) utilizing FlexViewer. RST personnel will continue perimeter air monitoring.

Additional action items that will be addressed include removal of the on-site propane tanks, waste removal, container destruction, inspection of potentially buried USTs and drums, and collection of additional multi-media samples.

2.2.2 Issues

On January 21, 2014, a heavy snowstorm forced closure of the Site at noon when the snow became too thick for safely working and commuting from the Site. On January 22, 2014, grouping of waste streams and overpacking activities were slowed due to a thick layer of snow, plowing of the Site and the extreme cold temperature.

2.3 Logistics Section

All logistical issues are being handled by EPA Region 2, RST personnel or ERRS personnel.

2.4 Finance Section

2.4.1 Narrative

On September 4, 2013, \$250,000 was given to the Kemron ERRS contract to perform an emergency removal assessment.

On September 27, 2013, \$600,000 was verbally authorized for the commencement of a Removal Action.

On November 22, 2013, the Regional Administrator approved the Action Memorandum documenting the verbal authorization of funding allocation, 12-month exemption, and request for ceiling increase. The Action Memo provides for a total project ceiling of \$4,080,000, of which \$3,500,000 is for mitigation.

On December 2, 2013, EPA allocated an additional \$500,000 to the ERRS contractor for mitigation activities.

On December 24, 2013, EPA allocated an additional \$200,000 to the ERRS contractor for mitigation activities.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Assessment	\$250,000.00	\$242,977.00	\$7,023.00	2.81%
ERRS - Removal Action	\$1,190,946.00	\$859,487.00	\$331,459.00	27.83%
TAT/START - RV	\$200,000.00	\$155,552.00	\$44,448.00	22.22%
START - RA (Includ CLP)	\$250,000.00	\$250,914.00	(\$914.00)	-0.37%
Intramural Costs				
USEPA - Direct	\$4,430,000.00	\$0.00	\$4,430,000.00	100.00%
USEPA - InDirect	\$1,445,509.00	\$0.00	\$1,445,509.00	100.00%
Total Site Costs	\$7,766,455.00	\$1,508,930.00	\$6,257,525.00	80.57%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Safety Officers have been identified through RST and ERRS. Health and Safety Plans have been completed by each contractor. Daily tailgate briefings are conducted.

From October 16 - 18, 2013 a Kemron Industrial Hygienist visited the Site and conducted a health and safety audit. Comments were addressed in the field and a report was generated on November 12, 2013. EPA conducted a health and safety audit on November 5, 2013. All recommendations were addressed following the report generated on November 6, 2013.

2.5.2 Liaison Officer

The OSC is acting Liaison Officer with local, State, and County officials.

2.5.3 Information Officer

Sophia Kelley has been designated as the Community Involvement Coordinator for the Superior Barrel and Drum Site. Ms. Kelley can be reached at 212-637-3670. Elias Rodriguez is the press coordinator and can be reached at 212-637-3664. Christopher Sebastian is the inter-governmental liaison and can be reached at 212-637-3597. George Zachos is the Regional Public Liaison and can be reached at 1-888-BUDSMAN.

A Community Update was approved by PAD on October 23, 2013.

3. Participating Entities

3.1 Unified Command

Unified Command is currently not being used.

3.2 Cooperating Agencies

EPA is coordinating efforts with various entities that have proven to be extremely helpful in the success of this project, including but not limited to:

- NJDEP
- Gloucester County HazMat Team and Department of Emergency Response
- Gloucester County Fire Marshal and Fire Department
- Police Department
- Glassboro Water Department
- Elk Township

4. Personnel On Site

EPA (1)

RST Contractors - Weston Solutions (1)

ERRS Contractors - Kemron (12)

5. Definition of Terms

Assisting and Cooperating Agencies - Agencies who are assisting the EPA response, but are not a part of Unified Command.

CERCLA - Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 U.S.C. Section 9601).

E Goods - Electronic machines which contain hazardous components.

Emergency Response - any activity undertaken by the Operations Section which mitigated an immediate threat to human health or the environment.

EPA - United States Environmental Protection Agency

ERRS - Emergency and Rapid Response Services contract.

FRP - Facility Response Plan. Under the Clean Water Act, as amended by the Oil Pollution Act, a plan for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such a discharge, of oil. Required by certain facilities that store and use large quantities of oil.

FWS or U.S. FWS - United States Fish and Wildlife Service.

HazCat - Hazardous Categorization, a field technique which utilizes a series of chemical tests on samples collected in the field (aliquots) to determine the characteristics of hazardous and non-hazardous substances. The characteristics which can be determined include matrix (material state), solubility, combustibility, flammability, pH and the presence of oxidizers, peroxides, sulfides, PCB, cyanide.

Hazardous Debris - Debris which contains compounds that make it inappropriate for municipal landfill disposal

Household Hazardous Waste - Small quantity waste from households that contain corrosive, toxic, ignitable, or reactive ingredients is hazardous. This includes pesticides, paint, solvents, etc.

Monitoring - Using equipment which will give limited real-time information about constituents in

environmental media. This method is used most often for air and water testing.

NELAC - National Environmental Laboratory Accreditation Conference.

NJDEP - New Jersey Department of Environmental Protection.

OSC - Federal On-Scene Coordinator.

OSHA - Occupational Safety and Health Administration.

PCBs - Polychlorinated biphenyls, a class of chemical compounds.

PPE - Personal protective equipment.

PRP - Potentially Responsible Party.

RCRA - Resource Conservation and Recovery Act.

REOC - EPA Region II Regional Emergency Operations Center.

RMP - Risk Management Plan. Under the Clean Air Act, certain facilities with large quantities of toxic potentially air born chemicals whose releases may impact human populations are required to submit to EPA a plan for hazard assessment, prevention, and emergency response.

RST - Removal Support Team contract.

Sampling -The process of taking environmental media for analysis at a laboratory of its constituents. These tests may require multiple days to complete, but test for a wider array of constituents than monitors.

Small Container - any container with a potential capacity of less than 5 gallons.

TRI - Toxic Release Inventory - A publicly available EPA database that contains information on toxic chemical releases and other waste management activities reported annually by certain covered industry groups as well as federal facilities. This inventory was established under the Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and expanded by the Pollution Prevention Act of 1990.

TCE - Trichloroethylene.

Unified Command - A structure based on the Incident Command System (ICS) that brings together the Incident Commanders of all major organizations involved in the incident in order to coordinate an effective response, while at the same time allowing each to carry out their own jurisdictional, legal, and functional responsibilities.

White Goods - Large home electronics such as refrigerators, washing machines, and dryers.

WW - Wastewater Treatment Facilities.

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/SuperiorBarrelAndDrum

<http://www.epa.gov/region2/superfund/removal/superiorbarrel/>

6.2 Reporting Schedule

At a minimum, POLREPS will be generated on a weekly basis. Should emerging situations need to be provided to parties, spot reports or bulletins will be sent via email.

As of September 26, 2013 daily updates were no longer provided. POLREPS will be generated on Mondays following the end of the operational period.

7. Situational Reference Materials

www.epaosc.org/SuperiorBarrelAndDrum

www.epa.gov/region2/superfund/removal/superiorbarrel/